Hearing scheduled
3/25/09 @ 9:00 a.m.
Portland, Maine
Objections due: 3/17/09

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE

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In re: *		Chapter 13
*		Case No. 05-22417
Steven Daggett and *		
Stacy Daggett, *		
*		
Debtors *		
*******************************		

RESPONSE TO TRUSTEE'S MOTION FOR STATUS CONFERENCE

NOW COME the Debtors, by and through their undersigned counsel, and respond to the Trustee's Motion for Status Conference as follows:

1. Debtors admit the allegations contained in Paragraph 1 of the Motion.

2. Debtors admit the allegations contained in Paragraph 2 of the Motion and aver that the property has been for sale and no buyer has been found as of yet. In addition, the Debtors are reviewing their ability to refinance their home in order to complete the Plan.

3. The Debtors intend to continue making plan payments until a sale or refinance can be accomplished.

Dated: March 16, 2009

/s/ Barry Evan Schklair
Barry Evan Schklair, Esq.

Barry Evan Schklair, Esq.
Attorney for Debtors
Mittel Asen, LLC
85 Exchange Street, 4th Floor
Portland, Me 04101
(207) 773-7500

CERTIFICATE OF SERVICE

I, Pamela Tevanian, do hereby certify that I have this day caused notice of the within Response to Trustee's Motion for Status Conference to be given this 17th day of March, 2009.

Notice will be electronically mailed to:

U. S. Trustee's Office
Peter C. Fessenden, Esq., Chapter 13 Trustee
All other parties listed on N.E.F. as being served electronically

Notice in the U. S. Mail, first class postage pre-paid to:

Steven and Stacy Daggett
5 Barbara Avenue
Scarborough, ME 04074

/s/ Pamela Tevanian
Pamela Tevanian, Paralegal

Barry Evan Schklair, Esq.
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Mittel Asen, LLC
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